

Louis E. Dolan, Jr. (Bar # 34437)  
401 9th Street NW, Suite 900  
Washington, DC 20004-2128  
Tel.: (202) 585-8818  
Email: ldolan@nixonpeabody.com

and

Dennis J. Drebsky (*pro hac vice* admission pending)  
Christopher M. Desiderio (admitted *pro hac vice*)  
437 Madison Avenue  
New York, New York 10022  
Tel.: (212) 940-3000  
Email: [cdesiderio@nixonpeabody.com](mailto:cdesiderio@nixonpeabody.com)

*Counsel for TomTom, Inc.*

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

In re:	)	Chapter 11
	)	
CIRCUIT CITY STORES, INC.,	)	Case No. 08-35653
et al.,	)	
	)	Jointly Administered
Debtors.	)	
	)	Hearing Date: January 16, 2009
	)	

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**NOTICE OF MOTION AND NOTICE OF HEARING ON (I) TOMTOM, INC.'S  
MOTION TO SEAL EXHIBIT FILED BY THE DEBTORS PURSUANT TO  
BANKRUPTCY CODE SECTION 107 AND BANKRUPTCY RULE 9018; AND  
(II) MOTION OF TOMTOM, INC., PURSUANT TO 11 U.S.C. § 105,  
BANKRUPTCY RULES 2002, 9006, 9007 AND LOCAL BANKRUPTCY RULE  
9013-1(N), FOR AN ORDER SETTING AN EXPEDITED HEARING**

**PLEASE TAKE NOTICE** that on January 14, 2009, TomTom, Inc.

("TomTom") filed an Emergency Motion To Seal Exhibit Filed By The Debtors  
Pursuant to Bankruptcy Code Section 107(b)(1) and Bankruptcy Rule 9018 (the  
"Motion").

**PLEASE TAKE FURTHER NOTICE** that contemporaneously with the filing of the Motion, TomTom filed a motion Pursuant to 11 U.S.C. § 105, Bankruptcy Rules 2002, 9006, 9007 and Local Bankruptcy Rule 9013-1(N), for an Order Setting an Expedited Hearing on the Motion (the “Expedited Motion”), which requests that the Motion be heard at the regularly scheduled omnibus hearing on January 16, 2009 at 10:00 a.m.

**Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in these bankruptcy cases. (If you do not have an attorney, you may wish to consult one.) If you do not want the Court to approve the Motion, or if you want the Court to consider your views on the Motion, then you or your attorney must:

[X] Attend a hearing before the Honorable Kevin Huennekens, United States Bankruptcy Judge, **at 10:00 a.m. (Eastern Standard Time) on January 16, 2009** at the United States Bankruptcy Court, Room 5000, 701 East Broad Street, Richmond, Virginia 23219. **If you or your attorney do not attend the hearing and object to the Motion, the Court may grant the relief requested in the Motion.**

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting the relief requested.

Dated: New York, New York  
January 14, 2009

Respectfully Submitted,

NIXON PEABODY LLP

By: /s/ Louis E. Dolan  
Louis E. Dolan, Jr. (Bar # 34437)  
401 9th Street NW, Suite 900  
Washington, DC 20004-2128  
Tel.: (202) 585-8818  
Email: [ldolan@nixonpeabody.com](mailto:ldolan@nixonpeabody.com)  
*Counsel for TomTom, Inc.*

and

By: /s/ Christopher M. Desiderio  
Dennis J. Drebsky (*pro hac vice* admission  
pending)  
Christopher M. Desiderio (admitted *pro hac*  
*vice*)  
437 Madison Avenue  
New York, New York 10022  
Tel.: (212) 940-3000  
Email: [cdesiderio@nixonpeabody.com](mailto:cdesiderio@nixonpeabody.com)  
*Counsel for TomTom, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of January, 2009, a true and correct copy of the foregoing Notice of Motion and Notice of Hearing filed by TomTom, Inc. was served via overnight mail and electronically via ECF on:

Robert B. Van Arsdale  
Office of the United States Trustee  
701 East Broad St. Suite 4304  
Richmond, Virginia 23219  
*Assistant United States Trustee*

David S. Berman  
Riemer & Braunstein LLP  
Three Center Plaza, 6th Floor  
Boston, Massachusetts 02108  
*Counsel for Bank of America, NA., as Agent*

Dion W. Hayes  
McGuire Woods LLP  
One James Center  
901 East Cary Street  
Richmond, Virginia 23219  
*Counsel for the Debtors*

Greg M. Galardi  
Jan S. Fredericks  
Skadden, Asps, Slate, Meagher & Flom  
One Rodney Square  
P.O. Box 636  
Wilmington, DE 19899  
*Counsel for the Debtors*

I also hereby certify that I caused a copy of the foregoing document to be delivered in PDF format, by e-mail, to:

[circuitcityservice@mcguirewoods.com](mailto:circuitcityservice@mcguirewoods.com) and [project.circuitcity@skadden.com](mailto:project.circuitcity@skadden.com).

/s/ Christopher M. Desiderio  
Christopher M. Desiderio